

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

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|---|---|--------------------------------|
| In re: |) | |
| |) | Case No. 08-35653 (KRH) |
| CIRCUIT CITY STORES, INC., et al., |) | |
| |) | Chapter 11 |
| Debtors. |) | |
| |) | (Jointly Administered) |

**MOTION FOR ADMISSION
PRO HAC VICE OF GARY MARK KAPLAN**

Augustus C. Epps, Jr. ("Movant"), hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing Gary Mark Kaplan (the "Applicant") of the firm of Farella Braun + Martel LLP, to appear *pro hac vice* in the above-referenced bankruptcy cases before the United States Bankruptcy Court for the Eastern District of Virginia (collectively, the "Bankruptcy Case") to represent Eel McKee LLC and Redtree Properties, L.P. In support of this Motion, Movant states as follows:

1. Movant is a member in good standing of the Bar of the Supreme Court of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

2. The Applicant is a member in good standing of the bar of, and admitted to practice in, the California State Bar, and is admitted to practice before the United States Supreme Court, the United States Court of Appeals for the Ninth Circuit, and the United States District Courts for the Northern, Central, Easter and Southern Districts of California; Eastern and Middle

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Movant

Districts of Pennsylvania, and, is special counsel with the firm of Farella Braun + Martel LLP in San Francisco, California. Mr. Kaplan has been practicing law since 1991. There are no disciplinary proceedings pending against the Applicant in any jurisdiction in which he is admitted to practice. See Exhibit A attached hereto.

3. Movant requests that this Court authorize the Applicant to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of Eel McKee and Redtree.

4. Movant and his firm will serve as co-counsel with the Applicant in the Bankruptcy Case (and related proceedings).

5. The Applicant's Application is appended to this Motion as Exhibit A and incorporated by reference herein.

6. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) counsel for the Debtors, and (c) all persons receiving electronic notice in the Bankruptcy Case as of the service hereof.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Gary Mark Kaplan to appear *pro hac vice* in the Bankruptcy Cases and related proceedings and grant Movant such other and further relief as is just.

Dated: March 17, 2011.

/s/ Augustus C. Epps, Jr.
Augustus C. Epps, Jr., Movant

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of March, 2011, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of Gary Mark Kaplan was served on all persons receiving electronic notice in these cases and by email or fax to the following:

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/s/ Augustus C. Epps, Jr.
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